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790 S. Buchanan. Amarillo, TX 79101

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April 13, 2020

Southwestern Public Service Company ("SPS"), effective April 13, 2020, has suspended its meter reading of residential meters, and of some commercial meters which are not reasonably accessible to SPS's meter readers at this time. SPS is taking this step to protect the health affecter safety of its customers and employees, as explained below. This has the potential to result in multiple, consecutive estimated bills for those customers. Accordingly, SPS is developing a communications plan in conjunction with the suspension of the meter reads.

SPS's meter readers are experiencing challenges with social distancing and customer confrontations in the field during the pandemic, particularly in reading residential meters. (SPS's residential metering technology still requires physical access to meters in order to obtain a read.) With many customers working from home and children at home from school, meter readers are reporting a higher number of customers in their yards, with children and pets.

SPS understands that many customers have concerns with the potential that meter readers could be exposed to coronavirus in conducting their duties and, in turn, expose others to it. While SPS has provided its meter readers with personal protective equipment and set protocols for removing employees from the field, SPS recognizes that these measures still do not fully guarantee the health and safety of employees or customers and that there may nevertheless be customer concerns about the risks inherent in having meter readers go from home to home. Moreover, the current situation, including strained economic conditions for many customers, heighten the risk of incidents between customers and employees.

For the most part, SPS is able to access commercial meters without the same concerns. SPS has, however, identified that there are commercial meters that require building access to read meters, with many of these buildings either closed or refusing entry to SPS personnel at this time. SPS believes it is appropriate, under current circumstances, to make reasonable efforts to accommodate property owner restrictions on property access.

In the first week of April, SPS's meter readers in its Texas service territory reported approximately 1,400 missed reads due to hazards attributable to coronavirus concerns related to meter access or customer interactions, including several incidents with customers that raised elevated safety concerns. Moreover, in Texas, SPS has had six instances of SPS field employees quarantined due to showing symptoms of COVID-19, though SPS has not had any confirmed cases of COVID-19 among its meter readers. SPS's experience in New Mexico has been similar.

¹ As identified below, SPS has already missed reads of some customers due to current conditions.

During the suspension period, SPS will continue to bill customers, with bills based on estimated usage, subject to true-up to actual usage when SPS is again able to safely access meters. The bill estimations will be based on historical usage and will not be adjusted to reflect any potential increase in usage related to stay-at-home measures. SPS will provide an outbound phone call to all manually-read customers informing them of the reason for an estimated bill prior to receiving it. These bills will, of course, be issued subject to applicable mitigation measures including the suspension of customer disconnections.

While it is uncertain how long these health, safety, and economic conditions may continue, SPS currently expects that customer are likely to receive two consecutive estimated bills. SPS intends to read meters after two consecutive months of estimates even if current conditions persist, but recognizes that may not ultimately be possible, and will advise the Commission on its ultimate course of action.

Sincerely,

/s/ William A. Grant

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